

June 5, 2019

Diane Glenn
Technical Advisory Group Chair
2018 International Residential Code Technical Advisory Group Chair
1500 Jefferson Street SE
PO Box 21499
Olympia, WA 98504

Dear Diane,

During the May 1, 2019 meeting of the Residential Code Technical Advisory Group (TAG), on behalf of the Washington Association of Building Officials (WABO), I presented a proposal amending the future 2018 Washington State Building Code. The proposed code change modified the definition of a Townhouse by providing a specified percentage of openness on the two sides that are required to open to a yard or public way. We believe this proposal will provide a level of consistency throughout the State when determining what an “open side” is, when there is not a definition of “open” in the Codes.

While there is no appeal mechanism for a TAG recommendation, we understand that we can provide a report that will be included in the information that goes from the TAG to the Committee. Attached you will find a copy of our issue paper for item 19-IRC04, Townhouse wall length.

Thank you for the work your technical advisory group does and the opportunity to present our ideas to it.

Sincerely,

Micah Chappell

Technical Code Development Committee Chair,
Washington Association of Building Officials

State Building Code Council Committee

Report to Committee requesting review of proposed Washington State code change

Submitted by Micah Chappell, Washington Association of Building Officials.

Log No. 19-IRC04 Townhouse Wall Length

Request for reconsideration: This item was heard in the May 1st TAG meeting and a motion to recommend it to the committee received not approved by the majority. However, the meeting was lightly attended by TAG members and the Washington Association of Building Officials would like to see this code change proposal heard by a larger group of stakeholders before it is disapproved. Leaving the code "as is" without clarifying what "open" means as it relates to townhouse units, leaves jurisdictions a path to inconsistent application of code requirements. This inconsistent interpretation could cause project delays from redesign of a project that was acceptable to one jurisdiction, but not another due to the code not being clear.

We request that the Committee or the State Building Code Council review and consider including this item in the 2018 Washington State Residential Code.

Proposed Code Change

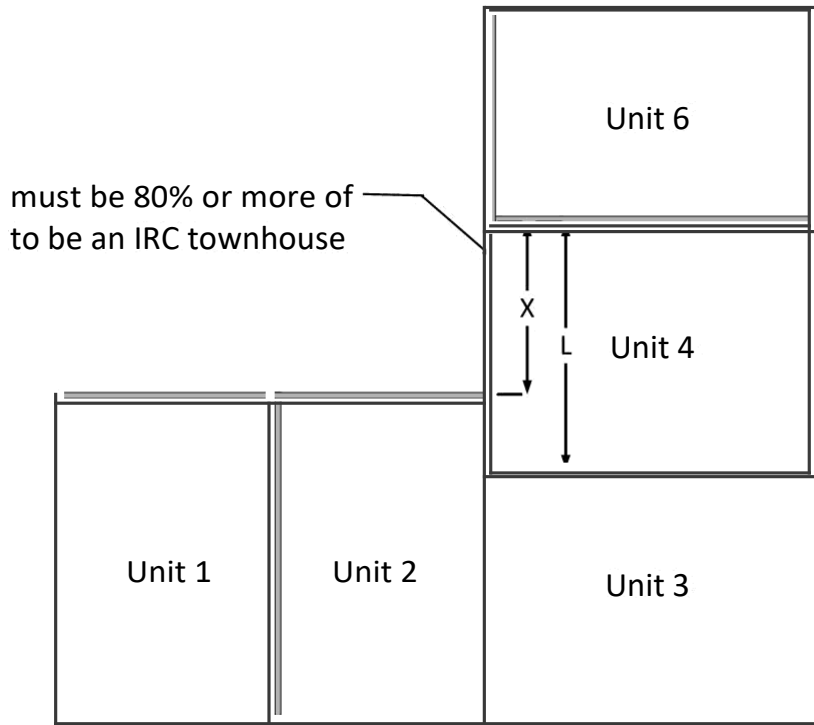
2018 IRC Section R202:

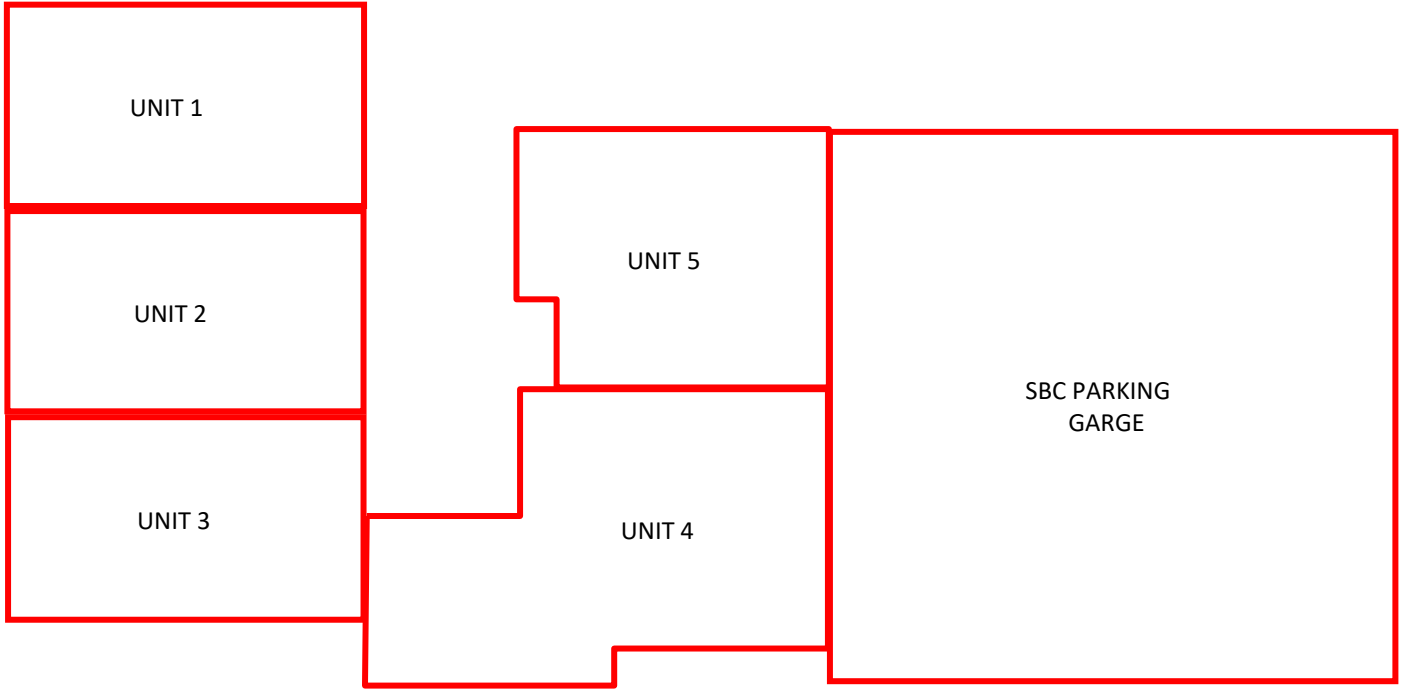
Amend section to read as follows:

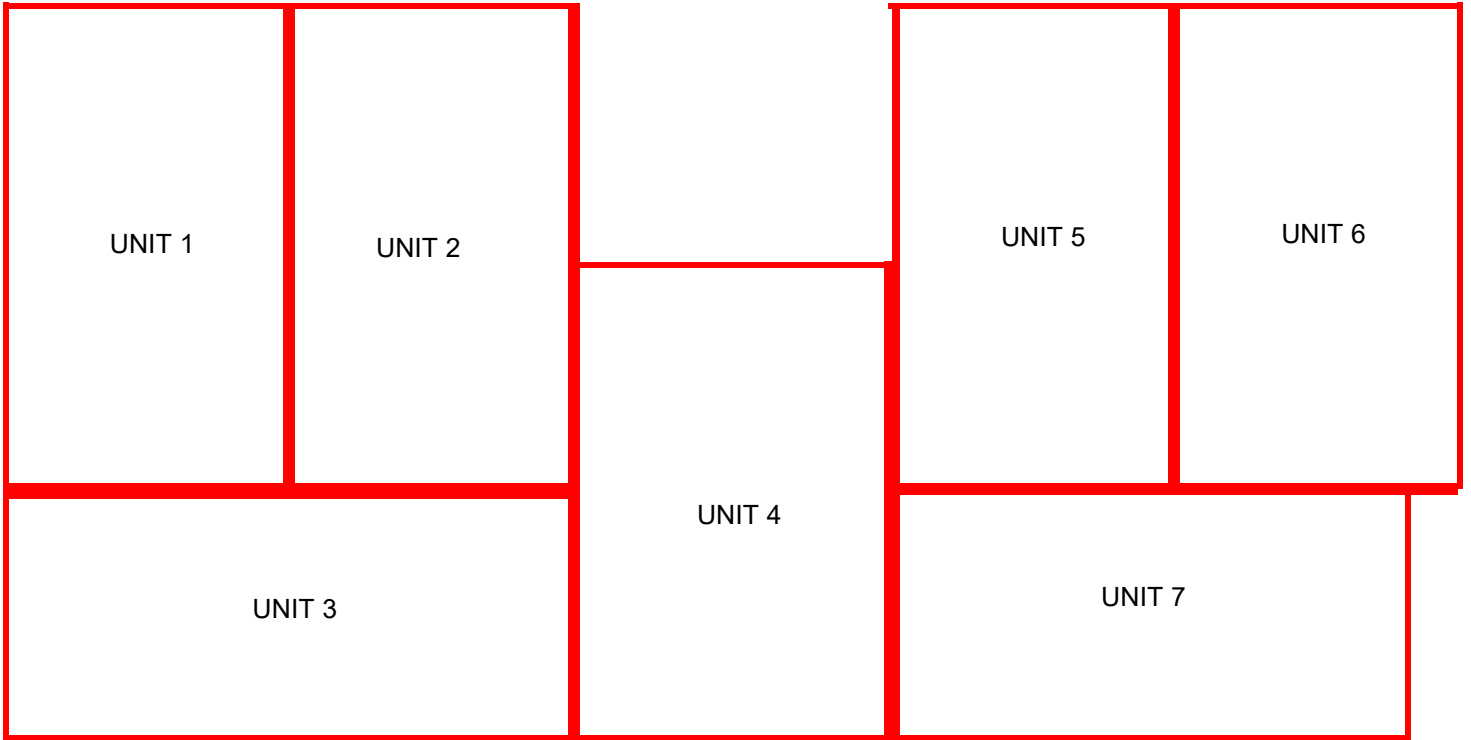
[RB] TOWNHOUSE. A single-family dwelling unit constructed in a group of three or more attached units in which each unit extends from foundation to roof. Each single-family dwelling unit and with has shall have a yard or public way on not less than two sides that extends at least 80 percent of the length of each of these two sides.

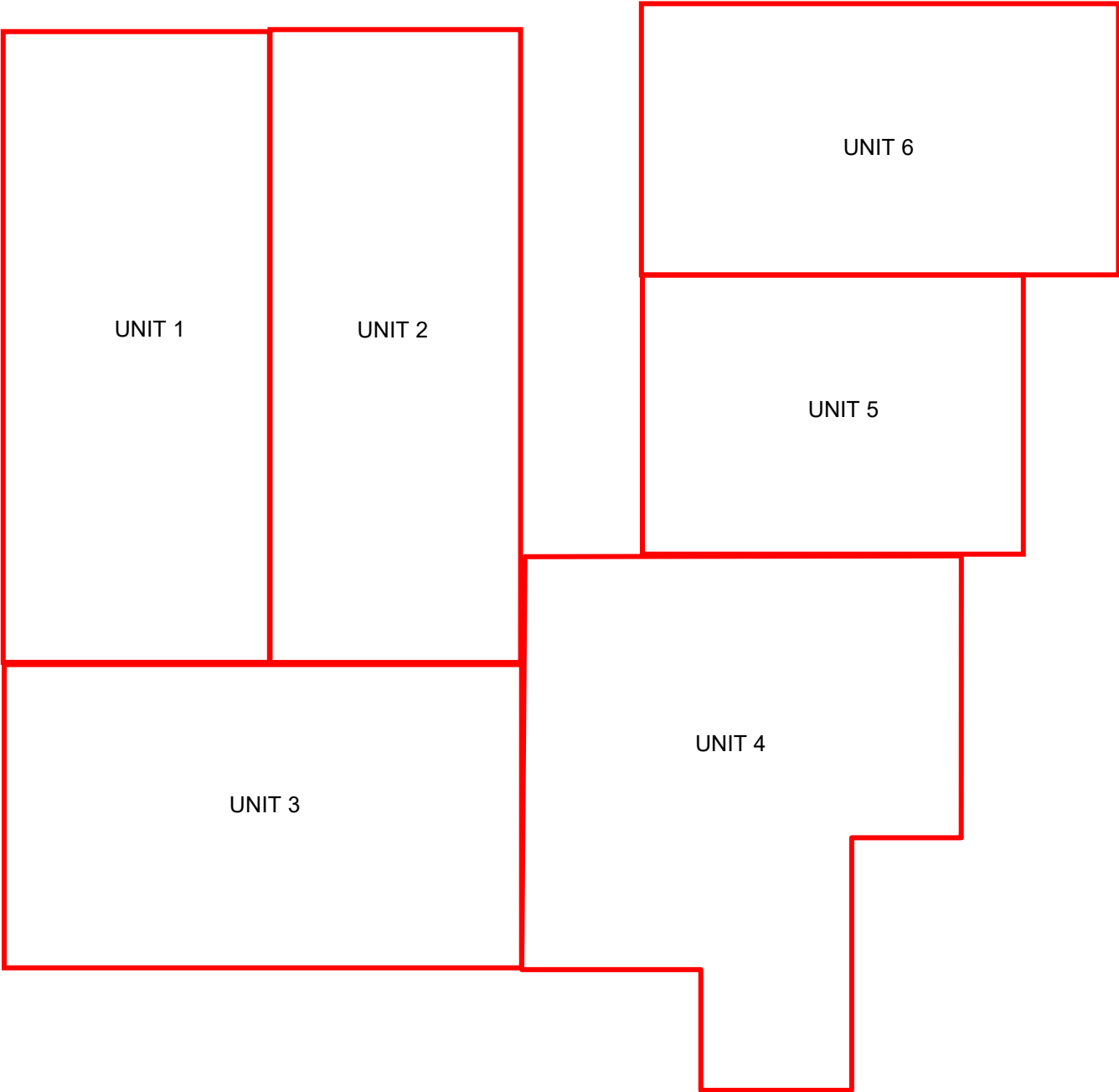
Reason for code change:

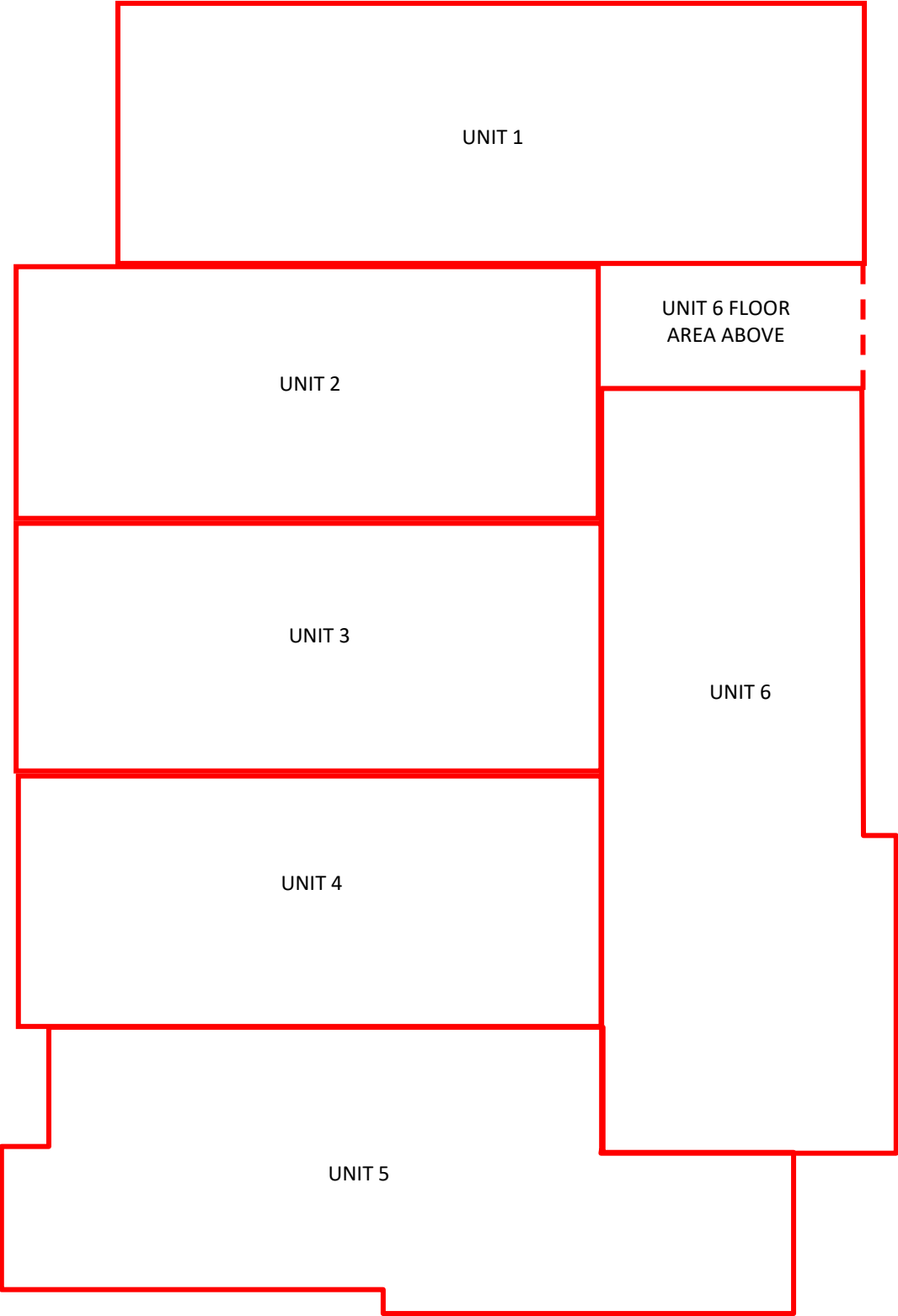
The definition of "townhouse" requires a yard or public way on not less than two sides, which is intended to provide some degree of independence from the other townhouse units in a building; however, the definition does not dictate the length of openness of those two sides to the required yard or public way. This proposal requires a minimum of 80% of the length of a side to have a yard or public way, which is a reasonable amount to provide the degree of independence intended and to provide fire department access. There is a need for this requirement as configurations of townhouses can create situations with a side that has a relatively small proportion of the wall length that has a yard or public way; for example, townhouses that are configured around the corner of a townhouse building similar to the drawings below.









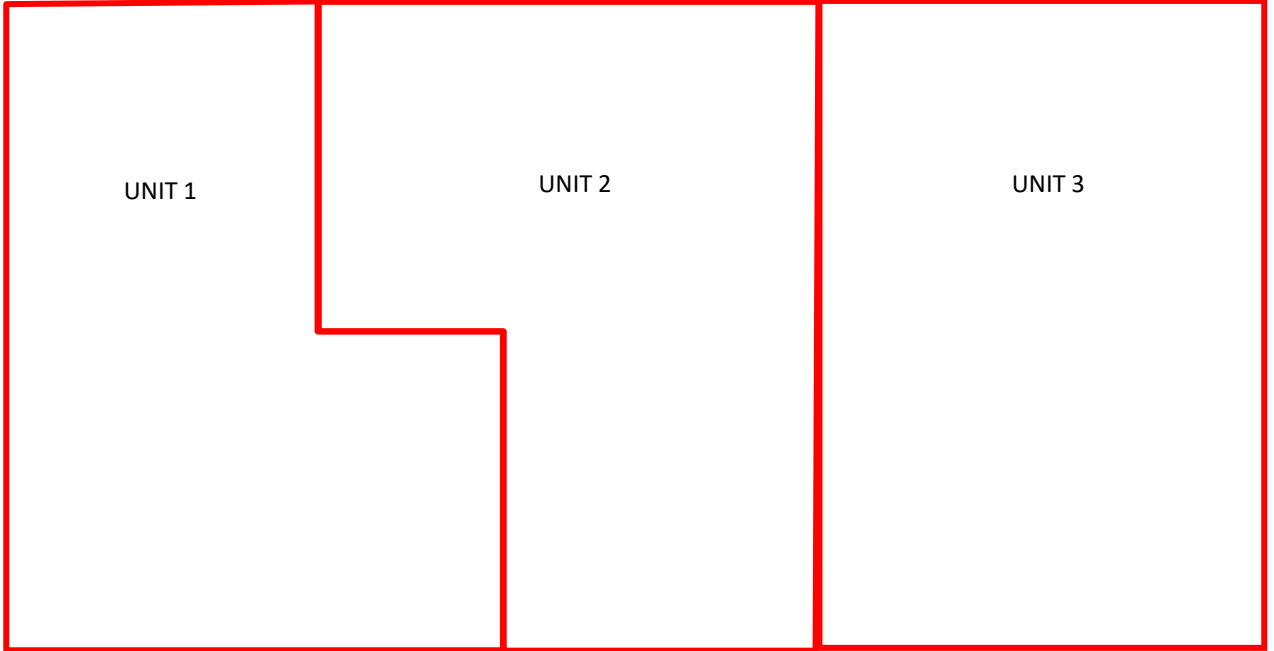


UNIT 1

UNIT 2

UNIT 3

UNIT 1
ENTRY
CANOPY



Unit 1

The diagram consists of three overlapping rectangles outlined in red. Unit 1 is a rectangle on the left. Unit 2 is a larger rectangle in the center, overlapping the bottom-right corner of Unit 1. Unit 3 is a rectangle on the right, overlapping the top-right corner of Unit 2. The text 'Unit 1' is centered within the first rectangle, 'Unit 2' is centered within the second, and 'Unit 3' is centered within the third.

Unit 3

Unit 2

